

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BATULA NOOR and HALIMA HAJI

Plaintiff,

-vs-

NATIONAL CREDIT SYSTEMS, INC.,

Defendant.

Case No.: 4:19-cv-2374

NOTICE OF REMOVAL

Defendant National Credit Systems, Inc. (“Defendant”) hereby gives notice of removal of this action from the Circuit Court for the City of St. Louis to the United States District Court for the Eastern District of Missouri pursuant to 28 U.S.C. §§ 1331, 1441 and 1446.

In support thereof, Defendant states as follows:

1. On or about July 22, 2019, Plaintiffs filed the above captioned civil action in the Circuit Court for the City of St. Louis, Case No.: 1922CC10931 (the “State Court Action”).
2. Defendant was served with the Complaint on July 29, 2019. Accordingly, this Notice of Removal has been timely filed pursuant to 28 U.S.C. § 1446(b).
3. The State Court Action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be properly removed pursuant to 28 U.S.C. §§ 1441 and 1446, as the claims asserted in the Complaint arise under the laws of the United States and raise a federal question.
4. Plaintiff’s complaint asserts violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”).

5. The district courts of the United States have original jurisdiction in civil actions arising under the FDCPA.

6. Defendant removes the State Court Action to the United States District Court for the Eastern District of Missouri because it is the venue that encompasses St. Louis, Missouri. Defendant removes this action without prejudice to Defendant's right to seek transfer of this action pursuant to 28 U.S.C. § 1404.

7. True and correct copies of all process, pleadings, and orders which have been served upon Defendant in this action are attached hereto as **Exhibit A** in accordance with 28 U.S.C. § 1446(a); are attached to this Notice of Removal.

8. Based upon the foregoing, this action is properly removed on the basis of federal question jurisdiction pursuant to 28 U.S.C. §§ 1331, 1441 and 1446.

WHEREFORE, Defendant National Credit Systems, Inc. requests that this action proceed in the United States District Court for the Eastern District of Missouri

Respectfully Submitted,

NATIONAL CREDIT SYSTEMS, INC.

By: /s/ Dennis J. Barton III
Dennis J. Barton III, #55176
The Barton Law Group, LLC
17600 Chesterfield Airport Rd., Ste. 201
Chesterfield, MO 63005
Phone: (636) 778-9520
Fax: (636) 216-6004
dbarton@bartonlawllc.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Dennis J. Barton III, hereby certify that on August 19, 2019, a copy of the foregoing Notice of Removal was served via the Court's CM/ECF system upon the following:

Amanda J. Schneider
4232 Forest Park Ave
St Louis, MO 63108

/s/ Dennis J. Barton III